



August 16, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So. Ag Stop 0268
Washington, DC 20250

Email: National.List@usda.gov

Fax: (202) 205-7808

Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket Number TM-04-07. PMO Wildwood supports the continued allowance of the substances on the attached list. These substances are used or may be used by our growers, processors, ingredient suppliers and/or in our manufacturing facility and are essential to the manufacture of our products. We are not aware of any new information in the last five years that indicates these substances are not safe and suitable for use in organic foods.

If you would like any specific supporting information for any of these substances, please let us know.

Sincerely,

Tom Lacina
EVP Sales & Marketing
PMO Wildwood
714.578.1497
toml@pmo.com

Cc: Organic Trade Association
National Organic Standards Board

**NATIONAL ORGANIC MATERIALS SUNSET REVIEW:
REQUEST FROM PMO WILDWOOD TO CONTINUE TO ALLOW**

Name of Substance	Location on National List	Use by PMO Wildwood and/or Reason for Continued Allowance
Chlorine materials - residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act.	205.601 (a) 2 205.605 (b)	Calcium hypochlorite, chlorine dioxide and sodium hypochlorite are used as algicides, disinfectants and sanitizers in the handling and processing of organic crops. This is critical for food safety purposes. PMO Wildwood and its suppliers also may use chlorine in the cleaning of equipment and food contact surfaces, again a critical food safety activity. Testing is always completed to assure residual chlorine levels are low to meet NOP requirements.
Hydrogen peroxide	205.601 (a) 4 205.601 (l) 4	At times, hydrogen peroxide is used as an algicide, disinfectant, sanitizer and disease control agent by suppliers to PMO Wildwood. Because there are few options available for these applications, we would like to have this remain on the list as an option if needed.
Ammonium carbonate - for use as bait in insect traps only, no direct contact with crop or soil	205.601 (e) 1	While not routinely used by PMO Wildwood or its suppliers, it is one of a limited number of options for pest control. Because there are few options for pest control substances, we would like to have this remain on the list as an option if needed.
Boric acid - structural pest control, no direct contact with organic food or crops	205.601 (e) 2	When needed, boric acid is an important pest control tool for PMO Wildwood and its suppliers. Because there are few options for pest control substances, we would like to have this remain on the list as an option if needed.
Elemental sulfur	205.601 (e) 4 205.601 (i) 9	While not routinely used by suppliers to PMO Wildwood, it is one of a limited number of options for pest control and plant disease control. Because there are few options for pest and disease control substances, we would like to have this remain on the list as an option if needed.
Lime sulfur	205.601 (e) 5 205.601 (i) 5	While not routinely used by suppliers to PMO Wildwood, it is one of a limited number of options for pest control and plant disease control. Because there are few options for pest and disease control substances, we would like to have this remain on the list as an option if needed.
Oils, horticultural - narrow range oils as dormant, suffocating, and summer oils	205.601 (e) 6 205.601 (i) 6	When needed, horticultural oils are an important pest and disease control tool for PMO Wildwood and its suppliers. Because there are few options for pest control substances, we would like to have this remain on the list as an option if needed.
Soaps, insecticidal	205.601 (e) 7	When needed, insecticidal soaps are an important pest control tool for PMO Wildwood and its suppliers. Because there are few options for pest control substances, we would like to have this remain on the list as an option if needed.
Sticky traps/barriers	205.601 (e) 8	Sticky traps and barriers are one of the most common types of substances used to control pests. Essential for use in organic production to control pests as the choices are limited. Used both by producers and handlers in the organic industry.
Coppers fixed -- used in a manner that minimizes accumulation in the soil and shall not be used as herbicides	205.601 (i) 1 205.601 (j) 6	Used for plant disease control and as a micronutrient by several suppliers to PMO Wildwood. This is important to optimize the soil condition to obtain the best crop quality.
Copper sulfate -- used in a manner that minimizes accumulation of copper in the soil	205.601 (i) 2 205.601 (j) 6	Used for plant disease control and as a micronutrient by several suppliers to PMO Wildwood. This is important to optimize the soil condition to obtain the best crop quality.
Micronutrients -- not to be used as defoliant, herbicide or desiccant. Soil deficiency must be documented by testing.	205.601 (j) 6 i. 205.601 (j) 6 ii.	Several micronutrients are used as fertility supplements by growers for PMO Wildwood including copper and soluble boron products. These are important to optimize the soil condition to obtain the best crop quality.
Liquid fish products - can be pH adjusted with sulfuric, citric or phosphoric acid.	205.601 (j) 7	Liquid fish products are used as fertility supplement by growers for PMO Wildwood. This is important to optimize the soil condition to obtain the best crop quality.
Synthetic inert ingredients as classified by the EPA.	205.601 (m)	Synthetic inert ingredients are used in pest control products to adjust concentration and to assure appropriate application. They do not come into contact with food.
Sodium nitrate -- unless use is restricted to no more than 20% of the crop's total nitrogen requirement.	205.602 (h)	Used by growers of a variety of other vegetables used by PMO Wildwood. At times, use of a small amount of sodium nitrate is important to optimize the soil condition to obtain the best crop quality.
Acids - lactic	205.605 (a)	Lactic acid may be used in cultured soy products made by PMO Wildwood. The lactic acid is present for flavor development and control of microorganisms. Alternates are not more natural and do not have the same flavor profile.
Acids - citric - produced by microbial fermentation of carbohydrate substances	205.605 (a)	Citric acid is used by suppliers to PMO Wildwood to adjust pH for control of microorganisms. Alternate acids are not more natural and do not give the same flavor profile.

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Calcium carbonate	205.605 (a)	Calcium carbonate is used as a calcium source in soy based cheese alternate. Because the soy based cheese alternate is a substitute for milk based cheese, the supplier to PMO Wildwood would like to be able to provide a similar calcium level for nutritional purposes. Alternates are not more natural and may change the flavor of the soy based cheese alternate.
Calcium chloride	205.605 (a)	At times, calcium chloride is used by suppliers to PMO Wildwood as a firming agent in beans and brined vegetables. Substitutes may be available but they are not more natural and so we have not tested them.
Calcium sulfate - mined	205.605 (a)	Calcium sulfate is used in the manufacture of tofu to cause the soy protein to curd and to develop firm texture. This substance has been used throughout history by tofu manufacturers to provide a specific texture which, while firm, is still softer than magnesium chloride/nigari tofu. Calcium sulfate is not currently used by PMO Wildwood but we would like to have it remain on the National List as an alternate to magnesium chloride which may be disallowed for use due to the Harvey vs. Veneman decision.
Carrageenan	205.605 (a)	Carrageenan is used as a stabilizer and emulsifier by a supplier to PMO Wildwood. It is a more natural choice than many other gums and has certain functionalities that make it most suitable for use in cottage cheese.
Colors, nonsynthetic sources only. Annatto.	205.605 (a)	Annatto is a vegetable dye from a plant source that is used as a coloring agent in cheese and cheese type products. No other natural substances give similar color.
Colors, nonsynthetic sources only. Turmeric	205.605 (a)	PMO Wildwood uses turmeric as a coloring in Indian type entrees and tofu based egg replacers. It is derived from a plant source. No other natural substances give similar color.
Dairy cultures	205.605 (a)	A variety of dairy cultures are used to develop flavor in cultured products. Each culture gives a unique flavor profile. No other more natural alternates are available for flavor development.
Diatomaceous earth - food filtering aid only	205.605 (a)	Diatomaceous earth is used to remove insolubles and impurities in solutions. Not used directly by PMO Wildwood but used by suppliers that provide ingredients to PMO Wildwood. Diatomaceous earth improves the quality, flavor and appearance of ingredients without leaving a residual in the ingredient. Applications where used include vinegar and sugar processing.
Enzymes - from edible, nontoxic plants, nonpathogenic fungi or nonpathogenic bacteria	205.605 (a)	Microbial enzymes are used in the manufacture of cheese as a rennet substitute. The only known substitutes are derived from animal sources or through genetic engineering. PMO Wildwood would not be able to use cheese in their organic products if microbial enzymes were not approved for use.
Flavors -- nonsynthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative	205.605 (a)	PMO Wildwood uses a limited number of natural flavors where it is difficult to develop flavor through cooking processes in the products.
Nitrogen - oil free grades	205.605 (a)	Liquid nitrogen is used in cryogenic cooling/freezing in the frozen food industry. Nitrogen is currently used by some suppliers to PMO Wildwood. The nitrogen dissipates into the air after freezing and does not remain in the food product.
Sodium bicarbonate	205.605 (a)	Sodium bicarbonate is a component of our baking powder that is used in a wide range of baked items. There are no more natural substitutes that give a similar functionality.
Tartaric acid	205.605 (a) 205.605 (b)	PMO Wildwood would like to see this ingredient remain on the National List in a form that can be used as a substitute for calcium phosphate which is use in baking powder. Calcium phosphate may be removed from the National List due to the Harvey vs. Veneman ruling and tartaric acid based substances may be the only available substitutes. Since tartaric acid is derived from grape skins, there is a possibility that tartaric acid and its derivatives could all be considered nonsynthetic and be placed on the National List accordingly.
Yeast - baker's	205.605 (a)	Baker's yeast may be used by PMO Wildwood for leavening and flavor development in a wide range of savory foods. There is no more natural substitute available with these functionalities.
Yeast - nutritional	205.605 (a)	Nutritional yeast is used by PMO Wildwood for cultured products and flavor development in addition to adding nutritional components to foods. There is no more natural substitute available with these functionalities.
Yeast - autolyzed	205.605 (a)	Autolyzed yeast is used in a limited number of products by PMO Wildwood for flavor development in foods. It allows for the development of foods with good flavor and lower amounts of sodium. There is no more natural substitute available with these functionalities.
Ascorbic acid	205.605 (b)	Ascorbic acid is may be used by the supplier of PMO Wildwood's fruit prep to maintain color/reduce browning. There are no other more natural color preservatives for pineapple juice which naturally contains ascorbic acid.
Calcium hydroxide	205.605 (b)	Calcium hydroxide/lime has been used for centuries to dissolve the pericarp (outer coating) of corn to improve it's ability to stick together. This processing allows for the manufacture of corn tortillas. Excess calcium hydroxide is removed from the corn in the process leaving only a small residual of calcium. Calcium hydroxide is also used by a few PMO Wildwood suppliers to assist in removing impurities from solutions. For example, calcium hydroxide can be used in the manufacture of cane juice to coagulate proteins and removed unwanted carbohydrates.

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	Calcium phosphate (monobasic, dibasic, and tribasic)	205.605 (b)	Mono-calcium phosphate is a component in baking powder which is used in a wide range of products. There is no other more natural substitute for leavening when yeast is not appropriate.
	Carbon dioxide	205.605 (b)	Carbon dioxide is used by suppliers of PMO Wildwood in the control of pests in the storage of grains and rice. It is used both for freezing foods and also for accelerated cooling, a critical food safety procedure. The carbon dioxide dissipates into the air after the cooling/freezing is complete and does not remain in the food product. PMO Wildwood does not currently use carbon dioxide in manufacture but would like to have this as an option in the future should we need additional cooling on new products.
	Glycerides (mono and di) - for use in drum drying of food	205.605 (b)	Mono and diglycerides are used in drum drying of certain ingredients such as potato flakes. It prevents the potatoes from sticking to the drum. Potato flakes have unique water absorption properties due to their surface area. For this reason, drum dried potato flakes are a preferred source for water binding function.
	Magnesium chloride - derived from sea water	205.605 (b)	Magnesium chloride is used in the manufacture of tofu to cause the soy protein to curd and to develop firm texture. Other calcium and magnesium based products do not give the same result. The magnesium chloride used by PMO Wildwood is naturally derived from sea water.
	Ozone	205.605 (b)	Ozone is used to reduce microorganisms in food processing for food safety purposes. The ozone dissipates completely during it's use and does not remain in the food. Ozone is used by some suppliers to PMO Wildwood and so we would like to have it remain on the list so that our ingredients still meet our requirements from a food safety perspective.
	Phosphoric acid - cleaning of food contact surfaces and equipment only	205.605 (b)	Phosphoric acid is used in sanitation of food contact surfaces and food equipment. This cleaning is critical in our food safety program. No residual remains that could contaminate the food.
	Potassium acid tartrate	205.605 (b)	PMO Wildwood would like to see this ingredient remain on the National List as a substitute for calcium phosphate which is use in baking powder. Calcium phosphate may be removed from the National List due to the Harvey vs. Veneman ruling and tartaric acid based substances may be the only available substitutes. While several tartaric acid substances are now on the synthetic list, they may be moved to the nonsynthetic list on petition as they are derived from grape skins.
	Potassium hydroxide	205.605 (b)	Potassium hydroxide is likely used to adjust the acidity in several ingredients supplied to PMO Wildwood. It is also used to extract the color from annatto seeds.
	Potassium tartrate made from tartaric acid	205.605 (b)	PMO Wildwood would like to see this ingredient remain on the National List as a substitute for calcium phosphate which is use in baking powder. Calcium phosphate may be removed from the National List due to the Harvey ruling and tartaric acid based substances may be the only available substitutes. While several tartaric acid substances are now on the synthetic list, they may be moved to the nonsynthetic list on petition as they are derived from grape skins.
	Sodium hydroxide	205.605 (b)	Sodium hydroxide is used widely in food processing for cleaning food contact surfaces and equipment. Use of this substance is essential in our food safety program. It is always fully rinsed from equipment after used in a cleaning step. Sodium hydroxide is also likely used to adjust the acidity in several ingredients supplied to PMO Wildwood.
	Gums - guar	205.606 (b)	Guar gum is a natural substance which is not yet available in an organic form. This ingredient is used in soy based items to give a desirable texture. No other more natural substitute is available with the same functionality.
	Lecithin unbleached	205.606 (d)	While organic lecithin is now available in a liquid form, it is not available in a dry form. PMO Wildwood uses dry lecithin in several products to achieve a desirable texture. This is a natural ingredient and no known substitutes are available.
	Lecithin bleached	205.605 (b)	Crude lecithin is bleached using hydrogen peroxide (which is listed under NOP allowed synthetics list). Bleached lecithin is necessary for certain functions.
	Pectin (low-methoxy)	205.605 (b)	Pectin is used by a supplier of PMO Wildwood for thickening soy based yogurt.
	Xanthan gum	205.605 (b)	Xanthan gum is widely used to thicken sauces and dressings. Xanthan gum is made from fermentation of sugars by xanthomonas campestris and various sugars can be used so that the product can be GMO free.
	Alginates	205.605 (b)	Alginates are used to add body, texture and temporary thickening to prevent spices from settling out prior to filling.
	Potassium Citrate	205.605 (b)	Potassium Citrate acts as a buffering agent and neutralizes if acid develops during fermentation process. PMO Wildwood does not currently use Potassium Citrate in manufacturing, but would like to have this as an option in the future should we need additional source for buffering agent (i.e. Sodium Citrate).
	Sodium Citrate	205.605 (b)	Sodium Citrate is used by the supplier of PMO Wildwood's soy flour to act as a buffering agent to neutralize acid development during fermentation process.